

Levy Affirmation Exhibit QQ

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13 UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

14 PREPARED FOOD PHOTOS, INC.,
15 f/k/a ADLIFE MARKETING
& COMMUNICATIONS CO., INC.,
16 a Florida for profit corporation,

17 Plaintiff,

18 v.

19 POOL WORLD, INC., a Washington for
profit corporation,

20 Defendant.

No. 2:23-cv-00160-TOR

**AFFIRMATION OF MARTHA
SOLT**

Hearing: August –, 2025
6:30 PM

21 1. My name is Martha Solt. I am Public Citizen Litigation Group's Office Assistant.

22 2. I received from Paul Levy a spreadsheet that he told me Prepared Food Photos had
23 produced in discovery, entitled "One-Off Infringement Tracking Sheet." One of the
24 columns in that spreadsheet contained amounts of money that had been paid to the plaintiff
25 in settlement of its demands for damages. The first date on the spreadsheet was April 24,
26
27 2019.
28

1 3. Mr. Levy asked me to total the amounts of settlements reported for each month
2 and year. I attach as Exhibit S1 the spreadsheet that I created.

3
4 4. Mr. Levy also gave a PDF document that he said Prepared Food Photos had
5 produced in discovery, and then four Excel spreadsheets containing the same data: financial
6 information about payments that the firm of CopyCat Legal had received on behalf of
7 Prepared Food Photos, Inc., showing as well the apportionment of each receipt into
8 payments to Prepared Food Photos and revenue retained by CopyCat Legal. Mr. Levy asked
9 me to derive the monthly and yearly total revenues received.
10

11 5. Because both the PDF and the Excel spreadsheets I received from Mr. Levy were
12 locked, I could not manipulate them to automate the calculation of totals. However, I was
13 unlock the data in the Excel spreadsheets as follows. I converted the spreadsheets to Adobe
14 and then converted them back to Excel which allowed me to manipulate most of the cells.
15

16 I then copied all of the credits, except for one carryover credit in each of the four
17 spreadsheets to a consolidated spreadsheet. From the consolidated spreadsheet, it is possible
18 to total the funds coming into these accounts. Exhibit S2 is the resulting spreadsheet
19
20

21 Pursuant to 28 U.S.C. § 1746, I hereby certify under penalty of perjury that the
22 foregoing is true and correct. Executed on July 8, 2025.

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Solt Affirmation Exhibit S1

One-off Infringement							
\$ Amount		Page #		Year	Month		Monthly total
250		1		2019	April		
3,000		1		2019	April	2019 April	3,250
1,200		2		2019	May		
2,500		3		2019	May		
1,000		3		2019	May		
3,200		4		2019	May		
2,500		4		2019	May		
1,000		4		2019	May		
2,500		4		2019	May		
1,000		5		2019	May		
1,000		5		2019	May		
1,000		6		2019	May		
8,000		6		2019	May		
4,000		7		2019	May		
500		8		2019	May		
8,000		8		2019	May		
2,800		8		2019	May		
3,500		8		2019	May		
3,000		8		2019	May		
8,000		8		2019	May		
1,000		9		2019	May		
1,000		10		2019	May		
2,000		11		2019	May		
1,000		11		2019	May		
1,500		11		2019	May		
400		11		2019	May	2019 May	61,600
1,500		14		2019	June		
8,000		15		2019	June		
5,000		15		2019	June		
12,000		15		2019	June		
4,000		15		2019	June		
2,000		15		2019	June		
2,000		18		2019	June		
2,000		20		2019	June		
400		20		2019	June		
1,000		21		2019	June		
1,980		21		2019	June		
2,500		22		2019	June		
20,000		23		2019	June		
1,500		25		2019	June		

10,000		25	2019	June			
500		25	2019	June	2019	June	74,380
2,200		26	2019	July			
1,225		27	2019	July			
2,000		29	2019	July			
1,200		31	2019	July			
1,000		31	2019	July			
20,000		32	2019	July			
1,500	per image	32	2019	July			
2,250		32	2019	July			
1,500		34	2019	July			
1,200		34	2019	July			
750		34	2019	July			
8,000		35	2019	July			
20,000		35	2019	July			
1,250		35	2019	July			
1,750		36	2019	July			
1,500		36	2019	July			
1,500		36	2019	July			
900		36	2019	July			
2,000		36	2019	July			
1,500		36	2019	July			
2,500		38	2019	July	2019	July	75,725
2,500		38	2019	August			
400		38	2019	August			
8,000		41	2019	August			
2,000		41	2019	August			
1,500		41	2019	August			
8,000		42	2019	August			
1,500		43	2019	August	2019	August	23,900
1,500	per image	45	2019	September			
1,000		45	2019	September			
1,600		45	2019	September			
1,600		47	2019	September			
1,600		47	2019	September			
8,000		48	2019	September			
1,000		48	2019	September			
3,000		49	2019	September			
1,500		49	2019	September	2019	September	20,800
3,000		52	2019	October			
850		55	2019	October			
750		56	2019	October	2019	October	4,600

1,500		56		2019	November			
500		57		2019	November			
1,000		58		2019	November			
1,500		59		2019	November			
8,000		59		2019	November			
2,000		60		2019	November			
800		60		2019	November			
20,000		62		2019	November			
2,000		62		2019	November	2019	November	37,300
3,000		64		2019	December			
8,000		65		2019	December			
2,000		67		2019	December			
2,500		67		2019	December	2019	December	15,500
3,000		75		2020	January			
1,500		75		2020	January			
2,500		76		2020	January	2020	January	7,000
3,500		77		2020	February	2020	February	3,500
3,000		87		2020	March			
1,625		87		2020	March	2020	March	4,625
2,000		91		2020	April	2020	April	2,000
2,500		93		2020	May			
2,500		95		2020	May	2020	May	5,000
3,500		98		2020	June			
2,500		98		2020	June			
3,500		101		2020	June	2020	June	9,500
3,000		103		2020	July	2020	July	3,000
2,500		108		2020	September			
1,500		108		2020	September	2020	September	4,000
5,000		112		2020	November			
3,500		114		2020	November	2020	November	8,500
3,500		117		2020	December			
5,000		117		2020	December			8,500
2,000		118		2021	January	2021	January	7,000
3,000		127		2021	March			
3,000		129		2021	March			
750		129		2021	March			
999		129		2021	March			
1,000		130		2021	March			
3,500		131		2021	March			
2,500		131		2021	March			
2,000		131		2021	March	2021	March	16,749
2,000		132		2021	April	2021	April	2,000

3,500		142		2021	June			
500		144		2021	June	2021	June	4,000
10,000		152		2021	July	2021	July	10,000
2,500		164		2021	September	2021	September	2,500
750		193		2022	February			
1,000		194		2022	February	2022	February	1,750
2,000		201		2022	March			
750		201		2022	March	2022	March	2,750
750		205		2022	April	2022	April	750
750		210		2022	May			
500		211		2022	May	2022	May	1,250
750		221		2022	July			
750		223		2022	July	2022	July	1,500
750		226		2022	August			
750		227		2022	August	2022	August	1,500
750		229		2022	September	2022	September	750
750		239		2022	November	2022	November	750
400		253		2023	February	2023	February	400
3,000		261		2023	March			
2,500		262		2023	March	2023	March	5,500
4,000		279		2023	June			
400		282		2023	June			
2,000		283		2023	June	2023	June	6,400
4,000		296		2023	August	2023	August	4,000
2,000		299		2023	September	2023	September	2,000
500		303		2023	October	2023	October	500
3,000		323		2024	January	2024	January	3,000
442,729								447,729

2019 Total	317,055
2020 Total	55,625
2021 Total	42,249
2022 Total	11,000
2023 Total	18,800
2024 Total	3,000
	447,729